

PRELIMINARY/PARTIAL COMMENTS
RIVER MILE 10.9
DRAFT PERIMETER AIR AND NOISE MONITORING PLAN
LOWER PASSAIC RIVER STUDY AREA
DATED MAY 2013

<u>No.</u>	<u>General Comment</u>
1	There are several typographical errors throughout the document. Please address for the next version.

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
1	Section 1.3	The monitoring plan focuses on impacts associated with the dredged material, itself. Please mention where consideration was made for the emissions of the heavy equipment to be utilized during the removal action.
2	Page 5, Section 3.1.2	This section states that Mobile #1 "will be moved to pre-determined locations throughout the park as well as at random locations as needed." Please clarify under what conditions these additional "random locations" are needed.
3	Page 7, Section 3.3	Given the proposed rotating schedule of COPC particulate analysis, consideration should be made to modify the plan in the event of a warning or action level exceedance. Please clarify and revise, as necessary.
4	Page 8, Table 3-1, Particulate and Mercury	For particulate collection the table needs to indicate the smallest particle size that will be captured by the filter.
5	Page 8, Table 3-1, Mercury	The filter described in this sampling approach will not capture the level of contamination associated with mercury vapor. It is recommended that an appropriate mercury vapor absorbent be added to the sample train to monitor the total impact from mercury that may occur during the removal action.
6	Page 10, Section 3.7.1	This section states that the dredging duration is anticipated to be less than 60 days, while other sections of the report refer to an anticipated duration of 60 to 90 days. Please clarify.
7	Page 11, Section 3.7.3	Is the reference to "Monitoring Location Section" intended to reference Section 3.1 of the Plan? If so, please add the section number.
8	Page 12, Table 4-1	How were the warning and action levels determined? Please provide the basis and justification for the selection of these concentrations.
9	Page 13, Table 4-2	<p>a. If corrective actions are implemented upon exceedance of a warning level and concentrations continue to rise, such that an action level is exceeded, what is the justification for not implementing work stoppage? Please clarify and revise, as necessary.</p> <p>b. Please adjust Table 4-2 headers on page 14, they shifted.</p>
10	Page 15, Section 4.5	What is the intent of the 15-minute limitation to restore monitoring levels below the action value? Please clarify what happens if this time constraint is not met.
11	Page 18, Figure 1	Please define the asterisk associated with DW #3*, as shown on this figure.
12	Page 9, Table 3-2	Recommend that Hydrogen Sulfide is monitored continuously, not just "if odor is detected".

13	Page 14, Table 4-2	Two action levels for each of three <u>sampling</u> parameters (See pages 13 & 14). All six of them say, "Notify EPA within 24 hours of receipt of analytical data." Each of these actions should include the statement, "and adjust real-time action levels if needed."
14	Appendix A, SOP No. KNOX-MT-009, Section 1.3	The method requires sampling in accord with Methods #29, D6784-02 and 0060. These sampling methods are not provided as part of this SOP and may differ from those described in the air monitoring plan. The Sampling plan and SOPs must show that one or more of these methods allow air sampling are as described in Table 3-1 of the sampling plan.